
**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

STEVEN BROWN, *et al.*,

Plaintiffs,

v.

**THE BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES, *et al.*,**

Defendants.

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: Case No.:
: 1:22-cv-00080-TSK
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DECLARATION OF IAN T. MASTERS

I, Ian T. Masters, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am a citizen of West Virginia and over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein. I make this Declaration in support of plaintiff's motion for summary judgment.

2. I am the President of the West Virginia Citizens Defense League ("WVCDL"). As President, I am duly authorized to act on behalf of the organization. WVCDL is a nonprofit organization under section 501(c)(4) of the Internal Revenue Code, founded in 2008, and incorporated under the laws of West Virginia, with its principal place of business in Charleston, West Virginia.

3. In my role as President, I am familiar with WVCDL's purposes as an organization and WVCDL's membership information and practices.

4. WVCDL seeks to preserve, expand, and perpetuate the right to keep and bear arms in the State of West Virginia through its non-partisan, nonprofit, all volunteer educational and lobbying efforts.

5. WVCDL has thousands of members and supporters in the State of West Virginia, both over and under the age of twenty-one, and at least one federal firearms licensee ("FFL").

6. Plaintiffs Brown and Weekley are members of WVCDL.

7. At least one of our member FFLs would sell and transfer a handgun, and handgun ammunition, to an individual 18-to-20-years-old but for the laws and regulations at issue in this lawsuit.

8. As a result of being unable to lawfully sell and transfer a handgun and handgun ammunition, to individuals 18-to-20-years-old, these member FFLs have lost sales that otherwise would have been able to be completed.

9. WVCDL brings this action as a public interest organization on behalf of its individual members in West Virginia between the ages of eighteen and twenty-one, who would purchase a handgun and accompanying ammunition from a FFL if it were not for the laws and regulations at issue in this case.

10. The injuries suffered by these members are germane to the core purposes of WVCDL.

DATED this 29th day of December, 2022.

A handwritten signature in black ink, appearing to read 'Ian T. Masters', is written over a horizontal line.

Ian T. Masters
President
West Virginia Citizens Defense League